

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANA WARNER,

Plaintiff,

v.

VISION SOLAR, LLC,  
VISION SOLAR NJ LLC, and  
IGS SOLAR LLC,

Defendants.

Case No.: 22-cv-5307-CPO-SAK

**DEFENDANTS VISION SOLAR LLC AND VISION SOLAR NJ LLC'S  
NOTICE OF  
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendants Vision Solar LLC and Vision Solar NJ LLC (hereinafter "Vision Solar" or "Defendants") comes before the Honorable Judge O'Hearn, U.S.D.J., on November 7, 2022, for an Order Granting the above named Defendants' Motion to Dismiss Plaintiff's Complaint under Rule 12(b)(6).

In support of my Motion, I rely on the attached Brief of Law.

Dated: October 6, 2022.

Respectfully submitted:

**FOX ROTHSCHILD LLP**

By: /s/ Brett Berman

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Attorneys for Defendant Vision Solar, LLC, and  
Vision Solar NJ LLC

**CERTIFICATE OF SERVICE**

I, Brett Berman, hereby certify that, on this date, I caused the foregoing document to be filed electronically with this Court, where it is available for viewing and downloading from the Court's ECF system by the Court and any and all parties. Pursuant to the Court's preferences, two copies of this Motion were mailed to the Court's chambers.<sup>1</sup>

By: /s/ Brett Berman  
Brett Berman

Dated: Dated: October 6, 2022

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<sup>1</sup> Pursuant to Local Rule 10.1, the addresses of all parties is as follows: Vision Solar LLC, 511 Route 168 Blackwood, NJ 08012. Vision Solar NJ LLC, 205 Arch Street, Philadelphia, Pa, 19106. IGS Solar, 820 Bear Tavern Road, West Trenton, NJ 08628. (Compl. ¶ 16.) Dana Warner, "resides in California." (*Id.* ¶ 9.)

In addition, pursuant to Local Rule 11.2 and 28 U.S.C. § 1746, this matter is not the subject of any other action pending in another court.